

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:)	
)	
CUMMINGS MANOOKIAN, PLLC,)	Case No. 3:19-bk-07235
Debtor.)	Chapter 7
)	Judge Walker

**MOTION TO CONTINUE HEARING ON TRUSTEE’S
OBJECTION TO CLAIM NUMBERS 3 AND 4**

Come now Jeanne Ann Burton, Trustee (the “Trustee”), by and through counsel, and requests a continuance until July 15, 2021, of the hearing on the Chapter 7 Trustee’s Objection to Claim Number 3 of North, Pursell & Ramos, PLC, on Behalf of Family Medical Associates, a/k/a Family Medical, P.C. (Doc. 98), the Chapter 7 Trustee’s Objection to Claim Number 4 of North, Pursell & Ramos, PLC, on Behalf of Toby Smith, M.D. and Middle TN Pulmonary Assoc. (Doc. 99) (Doc. 98 and Doc. 99, collectively, the “Claim Objections”), and the Response to Chapter 7 Trustee’s Objection to Claim Numbers 3 and 4 (Doc. 102) (the “Response”). In support for this request, the Trustee states that the Trustee and her counsel have a conflict for the hearing currently scheduled for June 25, 2021, and the Trustee is exploring whether the parties can resolve this matter with an agreed order. The parties believe that, with a brief continuance, they will likely be able to resolve this matter. Counsel for the responding parties has consented to the proposed continuance.

Therefore, the Trustee requests that the hearing currently scheduled for June 25, 2021, be reset on or after July 15, 2021.

Respectfully Submitted,

/s/ Phillip G. Young, Jr.

Phillip G. Young, Jr.

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Special Counsel to Jeanne Ann Burton, Trustee

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via the Court's electronic filing system upon all parties having entered appearances therein, and via United States mail, postage prepaid, upon the following, this the 22nd day of June, 2021:

Phillip North
North, Pursell & Ramos, PLC
414 Union Street, Suite 1850
Nashville, TN 37219

/s/ Phillip G. Young, Jr.

Phillip G. Young, Jr.